

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ILLINOIS UNION INSURANCE COMPANY as subrogee of CITY OF LAWRENCE	)	CIVIL ACTION
	)	
Plaintiff,	)	NO.04-10475 MLW
	)	
v.	)	
	)	
THE VIKING CORPORATION	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	

**JOINT MOTION TO AMEND THE DISCOVERY CONFERENCE REPORT**

Plaintiff Illinois Union Insurance Company (“Illinois Union”) and Defendant The Viking Corporation (“Viking”) have conferred and jointly move this Court to adopt and enter the *Amended Discovery Conference Report* submitted with this motion.

In support of this motion, the Parties state as follows:

1. Notwithstanding the best efforts of the Parties, initial discovery has taken longer than anticipated.

2. Thus, the Parties have conferred and agreed to amend all future discovery dates to ensure adequate time for each party to prepare and/or respond to all such deadlines and to prepare this matter for mediation and trial, if necessary.

WHEREFORE, Illinois Union and Viking respectfully request this Court to:

- (1) Enter an Order adopting and entering the *Amended Joint Discovery Report*; and
- (2) Grant all other relief that this Court deems just and necessary.

Respectfully submitted,

Plaintiff Illinois Union Insurance Company  
as subrogee of City of Lawrence,  
By Its Attorneys,

/s/ James P. Cullen, Jr

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Dated: April 25, 2005

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Respectfully submitted,

Defendant Viking Corporation  
By Its Attorneys,

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Dated: April 25, 2005